

Exhibit C

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND,)	
)	
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA, et al.,)	
)	
Defendants.)	

**PLAINTIFF’S OBJECTIONS AND ANSWERS TO
DEFENDANTS’ FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff Caryn Devins Strickland (“Plaintiff”), by and through undersigned counsel, objects to and answers Defendants’ First Set of Interrogatories (“Interrogatories”) as follows:

PRELIMINARY STATEMENT

1. Any objections or answers provided are based on certain non-privileged information or documents presently available to Plaintiff or her counsel, non-privileged information or documents that are publicly available, and Plaintiff’s best recollection of facts and information at this time. The following objections and answers may not necessarily reflect information or documents that are currently within the possession, custody, or control of other persons or entities. Subject to her pending objections, Plaintiff reserves the right to amend or supplement her objections and answers in accordance with the Federal Rules of Civil Procedure.

2. The investigation and discovery of the facts and documents relating to this case are ongoing. The objections and answers by Plaintiff, therefore, are based only upon information and documents presently known to Plaintiff and identifiable at this stage of discovery. Plaintiff

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Unknown

INTERROGATORY NO. 2:

State the name, address, and telephone number of each person you expect to call as a witness at trial in this case; the nature and substance of the witness's expected testimony; and the witness's relationship or connection to you (*e.g.*, friend, relative, employer, co-worker).

OBJECTIONS AND ANSWER:

Plaintiff restates and incorporates her general objections. Plaintiff also objects to this Interrogatory to the extent that it requests information subject to any privilege or restriction on the release of information, including the attorney-client privilege, spousal privilege, the attorney work product doctrine, and any other applicable privilege. Plaintiff further objects that the investigation and discovery of the facts and documents relating to this case are ongoing, and Plaintiff therefore reserves the right to supplement or amend her answer to this Interrogatory.

Subject to the foregoing, and without waiving Plaintiff's General and Specific Objections, Plaintiff answers Interrogatory No. 2 as follows:

1. Name: William Meyers

Address: 1 Columbus Cir., NE, Washington, DC 20544

Phone Number: (202) 502-3825

Nature and substance of the witness's expected testimony: OGG's involvement in Plaintiff's EDR proceeding. *See, e.g.,* Complaint ¶¶ 227–35, 236–51, 398–99, 407, 451, 474; ECF No. 94-7 (Walter Decl.); *see also* Def's Prod. US00000001–61.

Witness's relationship or connection to Plaintiff: General Counsel responsible for providing legal advice to both the respondent employing office and the Fourth Circuit officials administering her EDR proceeding. *Compare* ECF No. 94-7 (Walter Decl.) *with* Def's Prod. US00000001–61.

2. Name: Shirley Sohrn

Address: 1 Columbus Cir., NE, Washington, DC 20544

Phone Number: (202) 502-1100

Nature and substance of the witness's expected testimony: OGG's involvement in Plaintiff's EDR proceeding. *See, e.g.,* Complaint ¶¶ 227–35, 236–51, 398–99, 407, 451, 474; ECF No. 94-7 (Walter Decl.); *see also* Def's Prod. US00000001–61.

Witness's relationship or connection to Plaintiff: OGC official responsible for providing legal advice to both the respondent employing office and the Fourth Circuit officials administering her EDR proceeding. *Compare* ECF No. 94-7 (Walter Decl.) *with* Def's Prod. US00000001-61.

3. Name: Sheryl Walter

Address: Unknown

Phone Number: Unknown

Nature and substance of the witness's expected testimony: OGC's involvement in Plaintiff's EDR proceeding. *See, e.g.,* Complaint ¶¶ 227-35, 236-51, 398-99, 407, 451, 474; ECF No. 94-7 (Walter Decl.); *see also* Def's Prod. US00000001-61.

Witness's relationship or connection to Plaintiff: OGC official responsible for providing legal advice to both the respondent employing office and the Fourth Circuit officials administering her EDR proceeding. *Compare* ECF No. 94-7 (Walter Decl.) *with* Def's Prod. US00000001-61.

4. Name: Roger Gregory

Address: 1100 E. Main St., Ste. 501, Richmond, VA 23219

Phone Number: (804) 916-2700

Nature and substance of the witness's expected testimony: Witness's involvement in Plaintiff's EDR proceeding. *See, e.g.,* Complaint ¶¶ 32, 184, 217, 229, 276, 280-82, 285, 287, 320, 322, 366, 370, 392, 395, 400, 410, 451, 453, 484.

Witness's relationship or connection to Plaintiff: EDR presiding officer/ "supervisor" of accused Defender.

5. Name: James Ishida

Address: 1100 E. Main St., Ste. 501, Richmond, VA 23219

Phone Number: (804) 916-2700

Nature and substance of the witness's expected testimony: Witness's involvement in Plaintiff's EDR proceeding. *See, e.g.*, Complaint ¶¶ 33, 184, 243, 257–73, 284–98, 299, 320, 322–332, 333, 343, 355–61, 362–83, 384, 389–410, 429, 451–52, 471–86.

Witness's relationship or connection to Plaintiff: EDR Coordinator.

6. Name: Kimberly Llewellyn

Address: 1100 E. Main St., Ste. 501, Richmond, VA 23219

Phone Number: (804) 916-2700

Nature and substance of the witness's expected testimony: Witness's involvement in Plaintiff's EDR proceeding. *See, e.g.*, Complaint ¶¶ 360, 396, 474.

Witness's relationship or connection to Plaintiff: Human Resources Administrator for EDR Coordinator.

7. Name: Ed Smith

Address: [REDACTED]

Phone Number: [REDACTED]

Nature and substance of the witness's expected testimony: Witness's involvement in Plaintiff's EDR proceeding. *See, e.g.*, Complaint ¶¶ 411–26, 451, 454–463.

Witness's relationship or connection to Plaintiff: Mediator during Plaintiff's EDR proceeding.

8. Name: Lee Ann Bennett

Address: 1 Columbus Cir., NE, Washington, DC 20544

Phone Number: Unknown

Nature and substance of the witness's expected testimony: Witness's involvement in Plaintiff's EDR proceeding. *See, e.g.*, Complaint ¶¶ 184–94; ECF No. 94-8 (Bennett Decl.); Def's Prod. US00000001–61.

Witness's relationship or connection to Plaintiff: AO Deputy Director involved in complaint's allegations.

9. Name: Gary Bowden

Address: 1 Columbus Cir., NE, Washington, DC 20544

Phone Number: 202-502-1518

Nature and substance of the witness's expected testimony: Witness's involvement in Plaintiff's EDR proceeding. *See* Def's Prod. US00000001–61.

Witness's relationship or connection to Plaintiff: Chief of Staff to AO Deputy Director involved in complaint's allegations.

10. Name: Cait Clarke

Address: 1 Columbus Cir., NE, Washington, DC 20544

Phone Number: Unknown

Nature and substance of the witness's expected testimony: Witness's involvement in Plaintiff's EDR proceeding. *See, e.g.*, Complaint ¶¶ 184–94, 196–97; ECF No. 60-4 (Ex. C), at 1–2 (email from FEOO stating: “I let the Deputy Director know about what [Cait Clarke] is going to do”); Def's Prod. US00000001–66.

Witness's relationship or connection to Plaintiff: AO Chief of Defender Services involved in complaint's allegations.

11. Name: Jill Langley

Address: Unknown

Phone Number: Unknown

Nature and substance of the witness's expected testimony: Witness's involvement in Plaintiff's EDR proceeding. *See, e.g.*, Def's Prod. US0000000152, 158–65.

Witness's relationship or connection to Plaintiff: Attorney in AO's Fair Employment Opportunity Office involved in complaint's allegations.

16. Name: Heather Beam

Address: 401 West Trade St. Charlotte, NC 28202

Phone Number: (704) 350-7400

Nature and substance of the witness's expected testimony: Witness's involvement in Plaintiff's EDR proceeding. *See, e.g.*, Complaint ¶¶ 213, 218, 243, 258, 286, 287, 297, 299–321, 325, 329, 333–37, 343, 356, 362–67, 383–86.

Witness's relationship or connection to Plaintiff: EDR Investigator.

17. Name: Bill Moormann

Address: 129 West Trade St., Suite 300, Charlotte, NC 28202

Phone Number: (704) 374-0720

Nature and substance of the witness's expected testimony: Witness's involvement in and knowledge of complaint's allegations. *See, e.g.*, ECF No. 78-1.

Witness's relationship or connection to Plaintiff: Administrative Officer for FDO.

18. Name: Anthony Martinez

Address: Unknown (contact through counsel)

Phone Number: Unknown (contact through counsel)

Nature and substance of the witness's expected testimony: Witness's involvement in and knowledge of complaint's allegations. *See, e.g.*, ECF No. 78-3.

Witness's relationship or connection to Plaintiff: Defender accused of wrongful conduct in EDR complaint.

19. Name: John Baker

Address: 129 West Trade St., Suite 300, Charlotte, NC 28202

Phone Number: (704) 374-0720

Nature and substance of the witness's expected testimony: Knowledge and facilitation of continuing hostile working environment.

Witness's relationship or connection to Plaintiff: Incoming Defender after prior Defender was not reappointed by the Fourth Circuit.

20. Name: JP Davis

Address: 129 West Trade St., Suite 300, Charlotte, NC 28202

Phone Number: (704) 374-0720

Nature and substance of the witness's expected testimony: Witness's involvement in and knowledge of complaint's allegations. *See, e.g.*, ECF No. 78-2.

Witness's relationship or connection to Plaintiff: First Assistant accused of wrongful conduct in EDR complaint.

21. Name: Peter Adolf

Address: 129 West Trade St., Suite 300, Charlotte, NC 28202

Phone Number: (704) 374-0720

Nature and substance of the witness's expected testimony: Witness's involvement in complaint's allegations. *See, e.g.*, Complaint ¶¶ 53–56, 99, 345–54, 492.

Witness's relationship or connection to Plaintiff: "Team Leader" involved in complaint's allegations.

22. Name: Josh Carpenter

Address: Grove Arcade Building, 1 Page Avenue, Suite 210, Asheville NC 28801

Phone Number: (828) 232-9992

Nature and substance of the witness's expected testimony: Witness's involvement in complaint's allegations. *See, e.g.*, Complaint ¶¶ 152–55, 163, 169–72, 206, 216, 381, 408.

Witness's relationship or connection to Plaintiff: "Appellate Chief" involved in complaint's allegations.

Plaintiff reserves the right to supplement her answer to this Interrogatory with other witnesses she may call at trial.

INTERROGATORY NO. 3:

State all facts supporting your contention that Defendants violated your constitutional right to due process.

OBJECTIONS AND ANSWER:

Plaintiff restates and incorporates her general objections. Plaintiff also objects to this Interrogatory to the extent that it requests information subject to any privilege or restriction on the release of information, including the attorney-client privilege, spousal privilege, the attorney work product doctrine, and any other applicable privilege. Plaintiff further objects to this Interrogatory on the grounds that the Interrogatory is overly broad and unduly burdensome (*e.g.*, "[s]tate all facts" relating to due process claim), as set forth in General Objections 7–10.

Subject to the foregoing, and without waiving Plaintiff's General and Specific Objections, Plaintiff answers Interrogatory No. 3 as follows:

The facts supporting Plaintiff's contention that Defendants violated her constitutional right to due process are set forth in the Fourth Circuit's opinion reversing the dismissal of her claims and allowing her due process claim to proceed against the official capacity defendants. *See Strickland v. United States*, 32 F.4th 311 (4th Cir. 2022). Plaintiff is aware of the following documents and information that support the showing identified by the Fourth Circuit in its opinion: (1) Plaintiff's verified complaint (ECF No. 1), (2) Plaintiff's summary judgment motion